

## **5.0 ASSESSMENT, PREVENTION, AND CONTROL OF FACILITY OPERATIONS**

This section of the EMS Manual describes an ongoing process for assessing and controlling facility operations to ensure compliance, as well as preventing releases to the environment. This section outlines a system of observations, inspections, and performance evaluations intended to continually evaluate the environmental performance of the plant as a whole and each of the business units individually.

The goal of the assessment, control, and preventative measures is to achieve continuous improvement in environmental performance. Attaining this goal requires both proactive and reactive remedies. Proactive assessment of operations involves the identification of conditions that may lead to non-compliance or chemical releases, and taking proactive preventative or corrective actions. Reactive assessment of operations involves the identification of root causes of, and parties responsible for, non-compliance or chemical releases and taking preventative/corrective action.

The assessment, control, and preventative actions of plant operations and activities is a multi-step, feed-back process involving the following key elements.

1. Identification, understanding, and communication of applicable regulatory requirements.
2. Establishment of key result areas and performance measurement methods and standards appropriate to those areas.
3. Establishment and communication of understandable and attainable environmental goals and objectives.
4. Measurement and monitoring of performance relative to measurable standards.
5. Evaluation of performance measurements and monitoring results and communication of evaluation results to personnel responsible for taking preventive/corrective action to improve environmental performance.
6. Investigations of non-conformance with environmental requirements and standards.
7. Identification, implementation, and tracking of preventive/corrective actions.

The above elements are incorporated in a continuous feed-back process designed to achieve continuing incremental improvement in the assessment, control and evaluation of plant operations and activities as they relate to environmental compliance and protection. Continuous improvement in environmental performance will be achieved by implementing the following system.

(The following sections would be fully “fleshed out” in the manual)

- 5.1 Assessment of Operations
  - 5.1.1 Environmental Process Flow Schematic Diagrams
  - 5.1.2 Environmental Performance Goals, Objectives, and Standards
  - 5.1.3 Environmental Performance Measurement and Monitoring
  - 5.1.4 Environmental Observations and Inspections
- 5.2 Control of Operations
  - 5.2.1 Investigation of Results of Operations Assessments
  - 5.2.2 Improvements in Environmental Performance
  - 5.2.3 Control of Purchased Products
  - 5.2.4 Control of Contractors
- 5.3 Continuous Evaluation of Operations
- 5.4 Penalties and Disciplinary Action